



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

MEMO ENDORSED  
P. 2

August 11, 2016

REQUEST TO BE FILED UNDER SEALBY EMAIL

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

<b>USDC SDNY</b> <b>DOCUMENT</b> <b>ELECTRONICALLY FILED</b> DOC #: DATE FILED: <u>3/12/18</u>
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Re: United States v. Abdulrahman El Bahnasawy, 16 Cr. 376 (RMB)

Dear Judge Berman:

In accordance with the direction of the Court at yesterday's status conference, the Government respectfully submits this letter to provide the Court with additional information in connection with its request, with the defendant's consent, for continued sealing and delayed docketing in this case. As the Court is aware, a proposed order for continued sealing and delayed docketing was jointly submitted by the parties at yesterday's status conference, and has been so-ordered by the Court.

Prior to July 5, 2016, the primary basis for sealing and delayed docketing was that publicity regarding this case would compromise the FBI's ongoing investigation of CC-1. On July 5, 2016, the Government's application for continued sealing was accompanied by a classified addendum providing the Court with certain additional information regarding the status of the ongoing investigation. While the additional investigative efforts discussed in the Government's July 5 classified addendum are ongoing, they are not, at this time, a basis for which the Government is seeking continued sealing. With respect to the status of the investigation of CC-1, [REDACTED]

[REDACTED] . While the Government believes that unsealing at this time [REDACTED] the primary basis for continued sealing and delayed docketing at this juncture is [REDACTED]

The Government is providing defense counsel with a redacted copy of this submission, which appropriately redacts information pertaining to the status of the FBI's ongoing investigation of CC-1. Defense counsel has advised the Government that the defense does not

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object to the redaction of such information regarding the ongoing law enforcement investigation. A copy of the redacted letter is enclosed for the Court's benefit. *See* Ex. A.

Respectfully submitted,

PREET BHARARA  
United States Attorney for the  
Southern District of New York

By: /s/ Negar Tekeei  
Negar Tekeei / George D. Turner  
Assistant United States Attorneys  
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cc: Sabrina Shroff, Esq. (by email) (with redactions)  
Clay Kaminsky, Esq. (by email) (with redactions)

Clerk to docket and file.

SO ORDERED:

Date: 3/9/18

Richard M. Berman

Richard M. Berman, U.S.D.J.